

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

ARTIS WHITEHEAD)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:24-CV-02991
)	JURY DEMAND
CITY OF MEMPHIS, JAMES HOWELL,)	
TERRY LYONS, ROBERT RAGLAND,)	
JOSEPH PEARLMAN, VIVIAN MURRAY,)	
THOMAS WARRICK, TIMOTHY GREEN,)	
EDWARD BASS, ROBERT HULL, JR.,)	
JAMES BOLDEN, and UNKNOWN)	
EMPLOYEES OF THE CITY OF MEMPHIS,)	
)	
Defendants.)	

**UNOPPOSED SECOND MOTION OF DEFENDANT TIMOTHY GREEN FOR
EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant Timothy Green (“Defendant Green”),¹ pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.2, hereby respectfully moves the Court to extend his deadline to respond to Plaintiff’s Complaint (ECF No. 1) through and including April 22, 2025. In support, Defendant Green states the following:

1. Plaintiff filed his Complaint on December 12, 2024.
2. The summons and Complaint were served on Defendant Green on or about February 25, 2025.
3. On March 19, 2025, the undersigned filed a Motion for Extension on behalf of Defendant Green (ECF No. 53.)

¹ Attorneys Bruce McMullen, Jennie Silk, and Briana Butler make this limited appearance in order to request an extension of Defendant Green’s deadline to respond to the Complaint.

4. Subsequent to the filing of the first Motion for Extension, it became apparent that a conflict exists that prevents Baker Donelson from representing Defendant Green in this matter.

5. Defendant Green's current deadline for filing a response to the Complaint is April 1, 2025.

6. Counsel requests, on Defendant Green's behalf, an extension up to and including April 22, 2025, so that Defendant Green may find representation and respond to the Complaint.

7. This Motion is made in good faith and not for the purpose of delay.

8. Plaintiff does not oppose this Motion.

WHEREFORE, Defendant Timothy Green respectfully requests that its deadline to respond to Plaintiff's Complaint be extended through and including April 22, 2025.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

s/ Bruce McMullen

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*Attorneys for Defendant City of Memphis
and Defendants Thomas Warrick, James
Howell, Robert Ragland, Edward Bass,
Joseph Pearlman, and James Bolden*

CERTIFICATE OF CONSULTATION

I, Bruce McMullen, hereby certify that counsel contacted Plaintiff's counsel via email on March 28, 2025, regarding this Motion. On March 31, 2025, counsel for Plaintiff, Meg Gould, responded that Plaintiff does not oppose this Motion.

s/ Bruce McMullen
Bruce McMullen

CERTIFICATE OF SERVICE

I, Bruce McMullen, hereby certify that on March 31, 2025 I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, and that upon filing, such system will serve a copy of the foregoing upon all counsel of record in this action.

s/ Bruce McMullen
Bruce McMullen